IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

MORGAN C. HUNTLEY

Case No. 1:22-cv-01164-CFC-SRF

Plaintiff,

v.

VBIT TECHNOLOGIES CORP., VBIT MINING LLC, ADVANCED MINING GROUP, DANH CONG VO a/d/a/DON VO, KATIE VO, SEAN TU, JIN GAO, LILLIAN ZHAO, JOHN DOE INDIVIDUALS 1-10, and ABC COMPANIES 1-10,

Defendants.

RENEWED MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Movant, Bayard P.A. hereby files the following Renewed Motion for Leave to Withdraw as Counsel for Defendant Danh Cong Vo (the "Motion). This Motion is brought pursuant to Rule 83.7 of the Local Rules of the United States District Court for the District of Delaware, and Rule 1.16(b) of the Delaware Lawyers' Rule of Professional Conduct.

In support of this Motion, the undersigned submit an Opening Brief and Declaration.

Based on a showing of good cause, Movant respectfully requests this Honorable Court grant the Motion and permit leave to withdraw as counsel.

Respectfully submitted,

/s/ Ronald P. Golden III
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Counsel

Dated: June 28, 2023

District of Delaware Local Rule 7.1 Statement

I hereby certify that a reasonable effort was made to reach agreement with

Plaintiff's counsel regarding the attached Renewed Motion for Leave to Withdraw

as Counsel (the "Motion"), and counsel for Plaintiffs do no oppose the Motion.

Dated: June 28, 2023

/s/ Ronald P. Golden III

Ronald P. Golden III (No. 6254)

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Renewed Motion for Leave to Withdraw as Counsel, Opening Brief in support, and Declaration thereto were served on the following on June 28, 2023:

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